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UTILITIES CGUARSSION

Attorney for the Idaho Conservation League

## BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF THE	)
APPLICATION OF IDAHO POWER	)
COMPANY FOR AUTHORITY TO	CASE NO. IPC-E-14-05  IDAHO CONSERVATION LEAGUE
IMPLEMENT POWER COST	
ADJUSTMENT ("PCA") RATES FOR	
ELECTRIC SERVICE FROM JUNE 1,	
2014, THROUGH MAY 31, 2015, AND	PETITION TO INTERVENE
TO UPDATE BASE RATES IN	
COMPLIANCE WITH ORDER NO.	)
33000.	)

The Idaho Conservation League ("ICL") petitions the Commission to intervene in this matter pursuant to the Idaho Public Utilities Commission Rules of Procedure, IDAPA 31.01.071-073. As discussed below, ICL has direct and substantial interests in these proceedings, and therefore should be granted intervention.

## 1. The name of this intervenor is:

Benjamin J. Otto Idaho Conservation League 710 N. 6<sup>th</sup> st. Boise, Idaho 83702 Ph: (208) 345-6933 x 12

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In the interest of conserving natural resources and reducing the costs, please provide hard copies of pleadings, testimony, and briefs only to the name and address above. Production requests, responses, notices, Commission orders, and other filings may be submitted via electronic mail in accordance with IDAPA 31.01.01.063.02-03.

2. The Idaho Conservation League claims a direct and substantial interest in this proceeding. As Idaho's largest state-based conservation organization, we have over 20,000 supporters, most of who are residential customers of Idaho Power. The supporters we represent have a strong interest in ensuring accurate accounting of power costs as well as ensuring the Power Cost Adjustment mechanism is implemented in a manner to serve the interests of ratepayers and the public. Specifically in this case, Idaho Power proposes to use energy efficiency funds to offset power costs. ICL and our members have a long-standing interest in ensuring the appropriate use of energy efficiency funds. The Power Cost Adjustment can also send price signals to ratepayers that encourage them to change their energy consumption behaviors. ICL and our members also have a long standing interest is preserving the price signal function. ICL's intervention will not unduly broaden the issues in this proceeding because Idaho Power proposed the use of different funding pools and the price signal function is inherent to the Power Cost Adjustment.

3. ICL intends to fully participate in this matter as a party. The nature and quality of ICL's intervention in the proceeding is dependent upon the nature and effect of other evidence in this proceeding. ICL may seek intervenor funding pursuant to IDAPA 31.01.01.161-165.

WHEREFORE, ICL respectfully requests the Commission grant this petition.

DATED this 23rd day of April 2014.

Respectfully submitted,

Benjamin J. Otto

Idaho Conservation League

#### CERTIFICATE OF SERVICE

I hereby certify that on this 2nd day of April, 2014, I delivered true and correct copies of the foregoing PETITION TO INTERVENE to the following persons via the method of service noted:

# Hand delivery:

Jean Jewell Commission Secretary (Original and seven copies provided) Idaho Public Utilities Commission 427 W. Washington St. Boise, ID 83702-5983

# **Electronic Mail:**

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## **ICIP**

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Benjamin J. Otto